

DECLARATION OF ARMANDO ANGARITA

I, Armando Angarita, hereby declare as follows:

1. I have worked for JP Morgan Chase Bank, N.A. ("Chase") for almost twelve years. I started in March 2004 as a bank teller at the Barry Plaza Branch in Chicago, Illinois. In May 2005, I was promoted to Assistant Branch Manager ("ABM"). I was transferred to the Logan Square Branch in January 2009, and then to the Armitage and Cicero Branch in June 2012, where I have since worked as an ABM. The facts set forth in this declaration are based on my personal knowledge.

2. I am responsible for managing branch operations. This includes managing branch personnel to defend against a variety of risks. As a financial center, the branch is a target for a wide variety potential fraudulent or illegal activity. Through the tellers and others, the branch handles millions of dollars in transactions. The branch faces threats ranging from attempted fraud, money laundering, and robbery. My managerial responsibilities include interpreting, implementing, and enforcing policies and procedures that are designed to detect and prevent threats to the branch and comply with certain legal requirements. This includes training employees on policies and procedures, answering their questions, developing safety plans and protocols for the branch, providing managerial review of escalated situations, and coaching or disciplining employees who violate Chase policies. With respect to fraud prevention, all suspected incidents of counterfeit checks, wire fraud, money laundering, and forgeries must be immediately reported to me or the Branch Manager, so we can assess the situation and determine the appropriate course of action.

3. I also am the Branch Safety Coordinator, with responsibility for communications with the Corporate Security liaison, managing security control activities, and maintaining records for emergencies and branch security.

4. Tellers and bankers regularly come to me as a manager when they need to escalate an issue or get manager approval for something. Tellers and bankers come to me for guidance on escalated customer issues or complaints, their own complaints about scheduling or

other issues relating to their employment, or even what to do about panhandlers outside of our Branch. I almost always handle and resolve employee and customer issues and complaints without the assistance of the Branch Manager.

5. I also have the authority to make certain exceptions to bank policy. For instance, I can authorize a teller to cash a check, even though the balance of the customer's account is less than the amount of the check. In determining whether to grant such an exception, I consider the customer's account history and his or her overall relationship with Chase. I also have the authority to keep the drive-through window open past our published hours of operation to ensure customer satisfaction. I also have the authority to waive customer transaction fees without the amount limitations placed on tellers and bankers. These are decisions I make using my own judgment.

6. My Branch is unique in that we are open seven days per week and have more customer traffic than most other branches. For those reasons, new ABMs and Branch Managers are sent to my Branch for training. I am certified as a Chase trainer and I supervise and coach manager trainees to ensure that they understand their managerial duties and have the knowledge and skills necessary to perform effectively once they complete their rotation in our Branch, which typically lasts between two and four weeks.

7. I also directly supervise all ten bank tellers in my Branch. Each month, I draft their work schedule, which requires that I consider, among other things, whether certain tellers have requested days off, whether any tellers have limited availability due to school schedules, and, most importantly, whether the Branch's overall needs will be impacted by upcoming events, including monthly pay days and dates on which tax payments are due. Although the Branch Manager reviews the schedule, he rarely has altered a schedule I prepared. I also approve the majority of the tellers' requests for days off without Branch Manager input.

8. I assign tellers different tasks based on the needs of the Branch and supervise their performance. I run daily meetings of branch personnel to ensure that every teller and banker is aware of the operations plan I have for that particular day.

9. I also assign and direct the work of my tellers, including responsibilities for things like the vault, ATMs, travelers checks, and keys to the Branch. I also prioritize work for the tellers making sure that they ensure good customer service first and then handle other duties. In deciding which tellers are best suited for different responsibilities, I consider a number of factors, including the tellers' level of experience and individual abilities.

10. I also play an integral role in the hiring process for bank tellers. I coordinate directly with our branch recruiter to develop applicant criteria. Once the recruiter has narrowed the applicant pool based on my guidance, I conduct all initial interviews. If I think a particular applicant would be a great fit for our Branch, I arrange for the applicant to meet the Branch Manager. I recommend to the Branch Manager which candidate we should hire. I believe my recommendation carries great weight because I have been involved in hiring approximately twenty-five bank tellers at Chase, and I cannot think of a time when a Branch Manager has disagreed with one of my hiring recommendations.

11. In terms of training, each newly hired teller must complete online training then receive classroom training at another location before arriving at our Branch. Once a new teller begins working in our Branch, I often test his or her skills to determine what additional training is necessary. I make these assessments without input from the Branch Manager. I then assign the new teller to a more senior teller for instruction on areas I deem deficient. I also conduct spot checks of all tellers and bankers to ensure that they have the knowledge necessary to provide the best customer experience possible. If I determine that a particular teller or banker is in need of additional training, I conduct one-on-one training on my own initiative.

12. I am responsible for formally evaluating the performance of each teller twice per year. In their mid-year and annual evaluations, I rank each teller on various performance categories. Although the Branch Manager reviews these evaluations, he rarely edits what I have written.

13. On many occasions, I have recommended tellers for promotion to lead teller, ABM, or banker positions. Given my years of experience and the respect I have earned as an

ABM, the Branch Manager or District Manager consistently follow my advice and promote those that I have recommended.

14. I also am responsible for disciplining tellers and bankers in our Branch. On average, I issue two or three verbal warnings per year for relatively minor issues, such as inconsistent attendance. I do not need Branch Manager approval to issue these warnings. For more severe violations, I provide recommendations for discipline or termination. Two years ago, for instance, I became concerned that a teller I supervised may have stolen funds from the cash box. I investigated the matter and interviewed the teller, who confessed to me. I discussed what I had found with the Branch Manager and human resources and conveyed my view that the teller should be terminated. The Branch Manager and human resources agreed. I then informed the teller of the termination. Because I am closest to the tellers and bankers, my recommendations on discipline or termination are very important and usually adopted.

15. I perform managerial tasks approximately 80% of the time. My duties as a manager definitely are the most important duties I have.

16. From my experience, when I was at a branch with less customer traffic and fewer tellers, I spent more of my time behind a teller window. However, at a higher volume branch with more tellers such as the Branch I work at now, I have more tellers to supervise and spend more of my time on managerial duties.

17. I am aware that a lawsuit has been brought against Chase claiming that ABMs were misclassified as exempt from overtime requirements and should be paid overtime, that I could be invited to join that case as a plaintiff or class member.

18. I have not been coerced or threatened in any way to give the information in this declaration. I understand that I did not have to give this declaration, can provide or refuse to provide a declaration or testimony, and know that giving information in this declaration is not a condition of my employment with Chase. I attest to the information in this declaration voluntarily and of my own free will.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 18, 2015

Armando Angarita
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